

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	: CRIMINAL NO. _____
v.	: DATE FILED: _____
RAFAEL E. CARDONA-CASTRO, a/k/a "Wilson Delgado"	: VIOLATIONS: 21 U.S.C. § 846 (conspiracy to distribute more than 5 kilograms of cocaine - 1 count) 21 U.S.C. § 841(a)(1) (possession with intent to distribute more than 5 kilograms of cocaine - 1 count) : Notice of forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. From on or about August 26, 2004, through on or about September 7, 2004, in Reading, in the Eastern District of Pennsylvania, and elsewhere, defendant

**RAFAEL E. CARDONA-CASTRO,
a/k/a "Wilson Delgado"**

conspired and agreed, with others known to the United States Attorney, to knowingly and intentionally distribute more than 5 kilograms, that is, approximately 24 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

MANNER AND MEANS

1. It was part of the conspiracy that defendant RAFAEL E. CARDONA-CASTRO, a/k/a “Wilson Delgado” obtained multi kilogram quantities of cocaine from a drug courier and maintained this cocaine inside a vehicle kept in a storage locker in Reading, Pennsylvania.

2. It was further a part of the conspiracy that defendant RAFAEL E. CARDONA-CASTRO, a/k/a “Wilson Delgado” used telephones to facilitate the possession with intent to distribute cocaine in Reading, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objectives, the following overt acts, among others, were committed by the defendant in the Eastern District of Pennsylvania:

1. On or about August 26, 2004, in Reading, Pennsylvania, defendant RAFAEL E. CARDONA-CASTRO, a/k/a “Wilson Delgado,” met with a drug courier who had flown from Anchorage, Alaska to Philadelphia International Airport, and then took a taxi to a hotel in Reading, Pennsylvania.

2. From on or about August 26, 2004 through August 30, 2004, in Reading, Pennsylvania, defendant RAFAEL E. CARDONA-CASTRO, a/k/a “Wilson Delgado,” had several meetings and discussions with the drug courier and made arrangements to maintain multikilogram quantities of cocaine in a vehicle in Reading, Pennsylvania.

3. On or about September 6 and 7, 2004, in Reading, Pennsylvania, defendant RAFAEL E. CARDONA-CASTRO, a/k/a “Wilson Delgado,” possessed approximately 24 kilograms of cocaine concealed inside a Dodge Ram pick-up truck which he drove out of storage locker number 48 at the North Ninth Street Self-Storage in Reading, Pennsylvania.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about September 7, 2004, in Reading, in the Eastern District of Pennsylvania, defendant

**RAFAEL E. CARDONA-CASTRO,
a/k/a “Wilson Delgado”**

knowingly and intentionally possessed with intent to distribute more than 5 kilograms, that is, approximately 24 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), as charged in this information, defendant

**RAFAEL E. CARDONA-CASTRO,
a/k/a “Wilson Delgado”**

shall forfeit to the United States of America pursuant to Title 21, United States Code, Section 853, the following property:

(A) Any property used or intended to be used, in any manner or part, to commit or facilitate the commission of the violations of Title 21, United States Code, as charged in this information; and

(B) any property which constitutes and is derived from proceeds obtained directly or indirectly as the result of the violations of Title 21, United States Code, as charged in this information.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or
- (E) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to

seek forfeiture of any other property of said defendant.

All pursuant to Title 21, United States Code, Section 853.

PATRICK L. MEEHAN
United States Attorney